

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

GREEN CLOUD TECHNOLOGIES, LLC,

Plaintiff,

v.

ONEPATH SYSTEMS, LLC,

Defendant.

Civil Action No. _____

DEFENDANT’S ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES

Defendant Onepath Systems, LLC (“Defendant”) files its Answers to Local Civil Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Defendant is aware of no person or entity with a subrogation interest.

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has demanded a jury trial on all claims. Defendant contends that the case should be dismissed or transferred because of a forum selection clause in the relevant agreement.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned

company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Defendant is not publicly held. Defendant is not a parent, subsidiary, partner, or affiliate of any publicly held company. No publicly-held company owns 10% or more of Defendant. Onepath ITDS Holdings, LLC is the parent company of Defendant.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Venue in the Greenville Division is appropriate (*see* LR 3.01) because the case is removed from the Court of Common Pleas for Greenville County, South Carolina to the federal courts of the Greenville Division under 28 U.S.C. §§ 1332, 1441, and 1446. Additionally, Plaintiff's offices are located in the Greenville Division, at 510 Airport Road Unit A, Greenville, South Carolina 29607.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: There are no related matters.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Not applicable.

Respectfully submitted this 16th day of December 2020.

WYCHE, P.A.

/s/ Rita Bolt Barker

Rita Bolt Barker (U.S.D.C. I.D. No. 10566)

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